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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 * * *

11 SAID ELMAJZOUNB,
12 Plaintiff,

13 v.

14 SCOTT DAVIS, et al.,
15 Defendants.

Case No. 3:19-cv-00196-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS TO FILE A RESPONSE
TO PLAINTIFF'S MOTION FOR
ATTORNEY FEES AND COSTS AND TO
CONTINUE ORAL ARGUMENTS
(ECF NO. 111, 141)**

(THIRD REQUEST)

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17 Defendants, Renee Baker, Tara Carpenter, Scott Davis, Marc La Fleur, And Kim Thomas
18 (collectively, "Defendants"), by and through their Associate Counsel, Frank Toddre II, Esq. and of
19 the law firm Lewis, Brisbois, Bisgaard, and Smith LLP, and Plaintiff, Said Elmajzoub, by and
20 through his counsel, CAIR Legal Defense Fund, Gadeir I. Abbas, Lena F. Masri, Justin Sadowsky,
21 and Allen Lichtenstein, respectfully submit the following Stipulation and Order to Extend the
22 Deadline for Defendants to File a Status Report regarding Jumu'ah services and continue the
23 presently set status conference.

24 Upon receipt of the previous stipulation continuing deadlines, The Court denied the
25 following outstanding motions: Plaintiff's emergency motion to enforce (ECF No. 118),
26 Defendant's motion to strike (ECF No. 127) and Plaintiff's motion for attorney fees (ECF No. 132
27) -- without prejudice to their reinstatement. (ECF No. 146)

28 The following deadlines are set before the Court based upon prior stipulation (ECF No. 139)

1 (1) A status conference is currently set for October 20, 2023.

2 (2) NDOC is to produce a status report regarding Jumu'uah services to this Court by October
3 3, 2023, or a week prior to oral arguments.

4 The parties have agreed in principal to a resolution of the case and are finalizing the
5 settlement documents with a specific breakdown of costs to each side. Out of an abundance of
6 caution, the parties would request a sixty day continuance of all outstanding deadlines and oral
7 arguments on the Emergency Motion to Enforce to be set out to mid-August or a time convenient
8 to the Court. The parties are optimistic the matter should be finalized well before.

9 Since the last extension the parties have exchanged settlement documentation and redline
10 comments. There appear to be two clauses of the settlement agreement the parties are still finalizing
11 and negotiating. The majority of the settlement agreement has been approved by both sides.

12 This extension also permits time for parties to understand and discuss any administrative and
13 tax issues regarding contemplated payments prior to signing. The parties will be submitting a
14 stipulation to dismiss claims at the finalizing of documents while preserving the Court's order of
15 injunctive relief.

16 Accordingly, the parties request the above deadlines be continued sixty (60) days as
17 presented herein:

18 (1) The Status Conference set for October 20, 2023 be continued until December 19, 2023
19 or the first available time thereafter.

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(2) NDOC is to produce a status report regarding Jumu'uah services to this Court by December 5, 2023, or alternatively week prior to oral arguments.

DATED: October 2, 2023

DATED: October 2, 2023

By: /s/ Justin Sadowsky

By: /s/ Frank A. Toddre, II

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Gadeir I. Abbas
Justin Sadowsky
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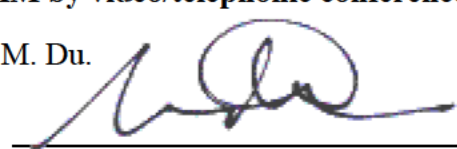
*Attorneys for Defendants Renee Baker,
Tara Carpenter, Scott Davis, Marc La Fleur,
and Kim Thomas*

Attorneys for Plaintiff Said Elmajzoub

ORDER

IT IS SO ORDERED. Further ordered: the hearing set for October 20, 2023 at 9:00 Am is continued to December 19, 2023 at 9:00 AM by video/telephonic conference in Reno Courtroom 5 before Chief Judge Miranda M. Du.

Dated: October 2, 2023.


United States District Court Judge